SOLVAY MINERALS

Dan - For Your Info

Bob G. — As Tony aware of Blue Plume issue at OCI?

October 2, 2001

RECEIVED OCT 2001 AIR QUALITY DIVISION

Tony Hoyt
WDEQ-Air Quality Division
250 Lincoln Street
Lander, WY 82520

RE: Reply to 2001 Annual Inspection Report

Dear Tony:

As we discussed, "blue-white" smoke is periodically visible from all three calciner stacks (CA-1&2 common stack, source AQD #17; CA-3, source AQD #48; and CA-4, source AQD #80). This smoke is formed after leaving the stack. Opacity in the stack, as recorded by certified, calibrated opacity monitors, can be at a lower percentage than the smoke that intermittently forms after leaving the stack. All three calciner stacks have historically been in compliance with opacity limits more than 95 percent of each quarterly reporting period.

The exhaust of all four calciners is controlled by electrostatic precipitators (ESPs). These ESPs are the Best Available Control Technology (BACT) for controlling particulate emissions from a source of this type. Control efficiencies of the ESPs are rated at 99.9%. These sources have some of the lowest particulate emission rates in the industry. However, ESPs do not control smoke that is formed after leaving the stack.

Solvay **is not certain** that blue-white smoke is more prevalent after the new calciner stack (CA-4) compared to the older calciners. The blue-white smoke is intermittent and occurs in varying degrees. So, it may have been coincidence that blue-white smoke was observed after leaving the CA-4 stack and not the other calciner stacks on the day of the inspection. In fact, CA-3 was not operating on the inspection day. Also, perhaps because CA-4 has a higher production capacity (275 TPH) compared to the older calciners (200 TPH each) it may appear to occasionally have more blue-white smoke than the others.

Concerning the new DR-6 Product Dryer stack (AQD #82), Solvay is not aware of blue-white smoke forming after leaving that stack, or any of the

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other product dryer stacks. Depending on meteorological conditions, steam can condense after leaving the stack, since moisture in the exhaust is generally 30 to 40 percent. We believe what was observed near the dryer stack on the day of the inspection to be either steam or normal low levels of opacity. Steam plumes can also periodically be seen from the calciner stacks, since the exhaust contains approximately 30 percent moisture due to the normal products of combustion and the molecular moisture in the trona ore being driven off.

If you have other questions or want to discuss this further, please feel free to contact me at (307) 872-6571.

Sincerely,
SOLVAY MINERALS, INC.

Dolly A. Potter
Environmental Services Supervisor

cc: Dan Olson